

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

AUTONOMOUS DEVICES LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 22-1466-MN
	)	
TESLA, INC.,	)	
	)	
Defendant.	)	

**MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES**

Pursuant to the Court’s oral order at D.I. 63, Autonomous Devices LLC (“AD”) and Tesla, Inc. (“Tesla”) (collectively, the “parties”) respectfully move this Court to schedule a teleconference to address outstanding discovery disputes regarding the following matters:

- Tesla’s refusal to produce certain source code.
- AD’s request for different and/or additional Tesla custodians under Paragraph 5(b) of the Delaware Default Standard for Discovery, Including Discovery of Electronically Stored Information (“ESI”) based on good cause and Paragraphs 1(a) and 1(b) of the Default Standard for Discovery.
- Tesla’s failure to meet the December 1 deadline for substantial completion of document production pursuant to the Scheduling Order (D.I. 25, ¶ 7(b)).
- AD’s refusal to provide information or documents in response to Tesla’s Interrogatory No. 1 and Request for Production Nos. 52 and 53, which request documents and information regarding third party funding of AD’s attorneys’ fees and/or expenses related to this litigation.

- AD's refusal to supplement its infringement contentions supplement to explain its infringement theories including to specifically identify where certain elements of the Asserted Claims are alleged to be found in the accused products.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (in person and/or by telephone) on the following date(s):

October 30, 2023

- Delaware Counsel for Plaintiff: Karen E. Keller
- Delaware Counsel for Defendant: *Absent*
- Lead Counsel for Plaintiff: John Holley
- Lead Counsel for Defendant: Matt Colvin

November 3, 2023

- Delaware Counsel for Plaintiff: Karen E. Keller
- Delaware Counsel for Defendant: Susan Morrison
- Lead Counsel for Plaintiff: Blair M. Jacobs
- Lead Counsel for Defendant: Matt Colvin

November 17, 2023

- Delaware Counsel for Plaintiff: Karen E. Keller
- Delaware Counsel for Defendant: *Absent*
- Lead Counsel for Plaintiff: Blair Jacobs
- Lead Counsel for Defendant: Ashley Bolt

November 29, 2023

- Delaware Counsel for Plaintiff: Karen E. Keller
- Delaware Counsel for Defendant: Susan Morrison
- Lead Counsel for Plaintiff: Blair Jacobs
- Lead Counsel for Defendant: Matt Colvin

December 5, 2023

- Delaware Counsel for Plaintiff: Karen E. Keller
- Delaware Counsel for Defendant: Susan Morrison
- Lead Counsel for Plaintiff: Blair Jacobs
- Lead Counsel for Defendant: Ashley Bolt

The parties are available for a teleconference on December 22, January 3, or January 4.

OF COUNSEL:

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Dated: December 7, 2023

/s/ Karen E. Keller

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